

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:)
Mary Strecker) Chapter 13
)
(Debtor)) 08-48385
)

**MOTION BY DEBTOR TO CONVERT CASE UNDER CHAPTER 7 TO CASE
UNDER CHAPTER 13**

COMES NOW, Douglas M. Heagler, attorney for Debtor, and pursuant 11 U.S.C. Sect 1307(a), the above named Debtor requests this Court to convert her case under Chapter 13 to a case under Chapter 7, and as grounds states as follows:

1. Debtor is eligible to be a Debtor under Chapter 7 of the Code and desires to convert this case to a case under that chapter 13.
2. Debtor has had a reduction in her work hours, and now has a dependent so that her household size has increased.
3. Debtor is filing an amended B22 along with this motion.
4. The Trustee currently has a motion to dismiss for failure to make plan payments.

WHEREFORE, the Debtor prays for this Court to convert this case under Chapter 13 to a case under Chapter 7 of the bankruptcy code.

Respectfully submitted,

The Law Office of Douglas M. Heagler

/s/ Douglas M. Heagler #115112, #48952
Attorney for Debtor
901 Boones Lick, Ste. 1W
St. Charles, MO 63301
636 278 2778
dheagler@freshstartbk.com

CERTIFICATE OF SERVICE

I certify that a copy of the attached pleading was served either electronically (via ECF) or via U.S. Mail on May 9, 2011 to the following parties:

John V. LaBarge, Jr.
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Office of the United States Trustee
111 S. 10th Street, Ste. 6353
St. Louis, MO 63143

Mary Strecker
3601 Arlington Dr.
St. Louis, MO 63303

Attached List

/s/ Douglas M. Heagler
Douglas M. Heagler, Fed #48952
901 Booneslick
St. Charles, MO 63301
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

IN RE: **Mary Strecker**

CASE NO. **08-48385**

CHAPTER **13**

Certificate of Service

I, the undersigned, do hereby certify that I served a copy of this Debtor's Motion to Convert was served upon the parties listed on the service list, by causing the same to be mailed in a properly addressed envelope, postage prepaid, on or before May 9, 2011.

American Express xxxxxxxxxxxxx2453 c/o Becket and Lee PO Box 3001 Malvern, PA 19355	Discover Financial xxxxxxxx5470 Attention: Bankruptcy Department PO Box 3025 New Albany, OH 43054	Unifund xxxxxxxxxxxx0386 Attention: Bankruptcy 10625 Techwoods Circle Cincinnati, OH 45242
Bank Of America 81 NC4-105-03-14 4161 Piedmont Pkwy Greensboro, NC 27420	Kohls xxxxxxxx6652 Attn: Recovery PO Box 3120 Milwaukee, WI 53201	
Chase 900 Stewart Ave Garden City, NY 11530	Missouri Department of Revenue Bankruptcy Unit P.O. Box 475 301 W. High Street Jefferson City, MO 65105-0475	
Chase xxxx 800 Brookside Blvd Westerville, OH 43081	Phillips and Burns LLC xxxx-xxxx-xxxx-4970 461 Ellicot St. 3rd Floor Buffalo, NY 14203	
Citi xxxxxxx4747 Attn: Centralized Bankruptcy PO Box 20507 Kansas City, MO 64915	SSM Patient Accounts 1015 Corporate Square Drive St. Louis, MO 63132	
Credit First xxxxx6764 PO Box 818011 Cleveland, OH 44181	St. Charles County Ambulance Dist. xxxx 4169 Old Mill Parkway St. Peters, MO 63376	